

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IGNITE USA, LLC,

Plaintiff,

v.

PACIFIC MARKET INTERNATIONAL,
LLC

Defendant.

Civil Action No. 16-cv-01930

Hon. Sara L. Ellis

JURY TRIAL DEMANDED

PACIFIC MARKET INTERNATIONAL, LLC'S MOTION TO STAY

Defendant Pacific Market International, LLC (“PMI”) respectfully moves the Court to stay this case pending a final written decision on PMI’s Petition for *inter partes* review challenging the validity of U.S. Patent No. 8,590,731 (“the ‘731 Patent”) filed with the United States Patent and Trademark Office (the “USPTO”) on July 25, 2016.

PMI asks the Court to stay this action at least until the USPTO determines whether to institute the *inter partes* review, which by statute must occur within six months of the July 25, 2016 filing of the IPR Petition. At that time, the parties can report to the Court whether the USPTO instituted the IPR, and if so, PMI requests the stay be continued until the USPTO issues a final written decision, which by statute must occur within eighteen months.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for PMI and plaintiff Ignite USA, LLC (“Ignite”) conferred on Monday, July 25, 2016. Ignite has not indicated whether it would oppose the present motion, but requested a copy of the motion prior to filing. A copy was delivered to Ignite shortly before filing. Accordingly, this motion is neither opposed nor unopposed at this time.

DATED: July 29, 2016

Respectfully submitted,

PACIFIC MARKET INTERNATIONAL, LLC

By: /Patrick T. Muffo/
One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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